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Hon. Colleen McMahon, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 24A
New York, NY 10007

March 24, 2020

VIA ECF

RE: United Specialty v. JD Commercial Builders Inc., et al
Civil Action No.: 1:18-cv-06735-CM
Our File No.: 20180587

Dear Judge McMahon:

Our office represents the Plaintiff, United Specialty Insurance Company ("USIC"), in connection with this matter.

Pursuant to the current scheduling order the parties were directed to file a joint pre-trial order by March 30, 2020. At this time, both USIC and Defendant, Ralph Spero, have filed dispositive motions which are fully submitted and pending before the court. Accordingly, given those motions and the work restrictions occasioned by the current public health emergency, we respectfully request an extension of the March 30, 2020 deadline, since the outcome of the motions may impact the content of the joint pre-trial order or moot the need for such an order. We propose the deadline be reset to 30 days from the date of issuance of the Court's decision on the dispositive motions.

All parties consent to this request. The pre-trial deadline has been reset on four prior occasions in order to accommodate the extension of other deadlines. This is the first request for an extension of just this deadline. This request does not impact any other dates.

Thank you for your courtesies in this matter.

Respectfully Submitted,

HURWITZ & FINE, P.C.

/s/ Jennifer A. Ehman

Jennifer A. Ehman

JAE:krk

cc James Walsh, Esq.
Matthew Conroy, Esq.

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3/25/20

MEMO ENDORSED

3/25/2020

Deadline
advanced
Sine die

Colleen McMahon